

AO 91 (Rev. 11/11) Criminal Complaint

**UNITED STATES DISTRICT COURT**  
 for the  
 Northern District of New York

JUN 21 2019
AT 10:00 O'CLOCK
John M. Domurad, Clerk - Syracuse

UNITED STATES OF AMERICA )  
 v. )  
 )  
 )  
 )  
 AARON BOHANNON )  
 )  
 )  
 Defendant )

Case No. 5:19-MJ- 395 (Twd)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date(s) of January 2019 to the Present in the county of Oneida in the Northern District of New York the defendant violated:

*Code Section*  
 18 U.S.C. § 2252A(a)(2) and (b)(1)  
 and 18 U.S.C. § 2252A(a)(5)(B) and  
 (b)(2)

*Offense Description*  
 Distribution and Possession of Child Pornography

This criminal complaint is based on these facts:  
 See attached affidavit

Continued on the attached sheet.

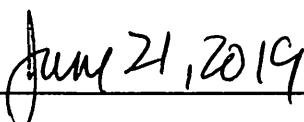

*Complainant's signature*

Sean A. Mullin, Special Agent

*Printed name and title*

Sworn to before me and signed in my presence.

Date:



City and State: Syracuse, New York

Hon. Thérèse Wiley Dancks, U.S. Magistrate Judge

*Printed name and title*

*Judge's signature*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK**

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

Sean A. Mullin, being duly sworn, deposes and states:

1. I am a Special Agent with the Department of Homeland Security (DHS) Homeland Security Investigations (HSI) in Syracuse, New York, and have been employed in this capacity for 15 years. I was previously employed as a Special Agent for the Florida Department of Law Enforcement for two years, and as a City of Syracuse Police Officer/ Detective for nine years. In my capacity as a federal agent I have investigated criminal violations relating to child exploitation and child pornography, including the attempted production and receipt of child pornography and possession of child pornography. I have had the opportunity to observe and review numerous examples of child pornography, as defined in Title 18, United States Code, Section 2256.

2. I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 18, United States Code, Section 2516(1). As a special agent, I am authorized to seek and execute federal arrest and search warrants for Title 18 criminal offenses, including offenses related to the sexual exploitation of minors, specifically those involving the use of a child for the purpose of producing a visual depiction of sexually explicit conduct, receipt and possession of child pornography, and distribution of child pornography.

3. I make this affidavit in support of a criminal complaint charging AARON BOHANNON with: (a) distribution of child pornography, in violation of Title 18, United States Code, in violation of Title 18, United States Code, Section 2252A(a)(2)(A) and (b)(1); and (b)

possession of child pornography, in violation of Title 18, United States Code, Section 2252A(a)(5)(B) and (b)(2).

4. The statements contained in this affidavit are based upon my knowledge, information provided by other law enforcement officers and personnel specially trained in the seizure and analysis of computers and electronic media, and on my experience and training. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that AARON BOHANNON has violated the above-referenced statutes.

#### **DETAILS OF THE INVESTIGATION**

5. In November 2018, with the consent of the account owner, a Special Agent with Homeland Security Investigations (HSI) in Chattanooga, Tennessee assumed the online presence of an individual under the investigation of HSI Chattanooga who was believed to be involved in trading child pornography on the social media platform Mega.nz.<sup>1</sup> The Chattanooga subject had been using the account knightwingzXXXX@gmail.com to actively trade (receive and distribute child pornography) over this platform.

6. On January 26, 2019, the Special Agent, posing as knightwingzXXX@gmail.com received a “Mega contact invitation” from an individual using abohannonXXX@gmail.com, with the following message: “Hey I have Mega but don’t know how to add you. Can you do it from your end. Mine is abohannonXXX@gmail.com. I look forward to trading”.

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<sup>1</sup> Among other things, the Mega.nz platform permits users to engage in end-to-end encrypted communications where individuals can send text communications and upload videos and images to each other.

7. The Special Agent added the account abohannonXXX@gmail.com to the contacts for knightwingzXXXX@gmail.com, thereby allowing communication between himself and the individual using abohannonXXX@gmail.com.

8. Later that day, the individual using abohannonXXX@gmail.com uploaded to the Special Agent posing as knightwingzXXXX@gmail.com approximately 21 video files. Most of these video files contained images of what the Special Agent determined was likely child pornography. Although the Special Agent could not view the full videos, he could see the initial screen shot/thumb nail image. From his review of that screenshot/thumb nail image, the Special Agent determined that the images depicted on the initial screen shot or thumb nail image were child pornography. Your affiant also has reviewed the screenshots and thumb nail images uploaded that day by the individual using abohannonXXX@gmail.com and several images/thumb nails either depict child pornography or, based on the initial image that is viewable and the file name, were likely video files that depicted child pornography. Several of these files are described below in Paragraph 10 and all of them are available for this Court's review upon request.

9. On January 27, 2019, the Special Agent acting as knightwingzXXXX@gmail.com continued his interaction with the individual using the abohannonXXX@gmail.com account. During that interaction, the individual using abohannonXXX@gmail.com uploaded to the Special Agent posing as knightwingzXXXX@gmail.com nine video files with corresponding thumb nail/screenshot images. From the Special Agent's review of the thumb nail/screenshot images, the Special Agent determined that the images and corresponding videos were child pornography. Your affiant also has reviewed the thumb nail images from the chat on that day, and several either depict child pornography or, based on the initial image that is viewable and file

name, were likely video files that depicted child pornography. Several of these files are described below in Paragraph 10 and all of them are available for this Court's review upon request.

10. Over the course of the two chat sessions on January 26, 2019 and January 27, 2019, the individual using abohannonXXX@gmail.com uploaded the following images/files, among others:

**2009 Kristin 05.mp4** (sent January 26, 2009): initial screen image of a 29 second video. Image portrays a female approximately 12 years of age, clothed, and standing next to an adult male. The adult male is exposing his fully erect penis with the female looking at the fully erect penis.

**2010 9yo-SuziQ\_compilation.avi** (sent January 26, 2009): initial screen image of a 13 minute and 10 second long video. This image depicts a female approximately 9-10 years of age sitting on a table. The female is nude and has her legs spread open to expose her vagina. The female is inserting her finger into her vagina.

**9yo-SuziQ-00b(36s).avi** (sent January 26, 2019): initial screen image of a 36 second video which appears to be a segment of the previously described 2010 9yo-SuziQ\_compilation.avi. Image depicts a juvenile female on her hands and knees on a table. The female is facing away from the camera with her legs spread in a manner to expose her vagina.

**2014-09- Two Lesbian mov 0215 Emma and little sis.avi** (sent January 26, 2009): initial screen image of a 25 second video. This image depicts an apparent teenage female lying on her back, legs spread and vagina exposed. Sitting on this female lying backwards is an apparent prepubescent female. This female has her legs spread exposing her vagina in a lascivious manner with her exposed vagina next to the other female's vagina.

**7620b0ca95825cd58304473d0f481a4d.mp4** (sent January 27, 2019): initial screen image of a 9 second video. This image depicts a female approximately 8-9 years of age on her stomach in a bathtub full of water. A male is in front of her with his erect penis in her face. The “start” button for the video is obstructing part of the girls face and the tip of the penis, but it appears that the female is performing oral sex on the adult male.

**Video May 15.mp4** (sent January 27, 2019): initial screen image of a 5 minute and 8 second video. This image depicts a female approximately 7-8 years of age lying on her back on a bed. The female has her legs spread exposing her vagina and is seen inserting her finger into her vagina.

11. On May 13, 2019, law enforcement served Google LLC with an Emergency Disclosure Request for all available information to identify the user of abohannonXXX@gmail.com. In response to the Emergency Disclosure Request, Google LLC provided the following information:

Name: Aaron

e-Mail: abohannonXXX@gmail.com

Recovery e-Mail: abohannonXX@gmail.com

Created on: 2015/11/21-20:43:25-UTC

Terms of Service IP: 67.241.11.21, on 2015/11/21-20:43:25-UTC

SMS: +1315868XXXX [US]

Google Account ID: 719532685947

Last Logins: 2019/05/13-21:11:10-UTC, 2019/05/13-20:03:55-UTC, 2019/05/13-18:44:38-UTC

From IP address: 74.79.67.113 (Spectrum/Charter Communications)

12. On May 13, 2019, law enforcement served Charter Communications with a Law Enforcement Emergency Disclosure Request for subscriber information related to IP address

74.79.67.113, and Charter Communications provided the following physical address as associated with IP Address 74.79.67.113: 1674 West Street, Utica, NY 13501.

13. Based on the forgoing and other information suggesting that Aaron Bohannon resided in Unit B at the 1674 West Street, Utica, New York address, your affiant sought and obtained a federal search warrant to search Aaron Bohannon's residence, among other locations, for evidence of child pornography offenses as detailed in the search warrant application.

14. On June 21, 2019, your affiant and other members of law enforcement executed the search warrant and interviewed Aaron Bohannon. Aaron Bohannon made post-*Miranda* admissions that he was the person who uploaded the above-referenced videos/images (see Paras. 8-10) using Mega.nz and that he allowed other people access to his child pornography by uploading it to locations that they could access. He further admitted to possessing material depicting child pornography. An initial forensic review of electronic devices located at Aaron Bohannon's residence revealed at least 100 images of child pornography, including images of the sexual abuse of toddlers, on Bohannon's mobile telephone (a Samsung Galaxy J-7, model number SM-J737V; IMEI 359500095012759).<sup>2</sup> Among other images found on the Samsung mobile device, two are described below. All of the images are available to the Court for review upon request:

**lz52VAxl.jpg:** depicts a female child who appears to be less than 8 years old performing oral sex to an erect adult male's penis.

**g7hhiDwK.jpg:** depicts a female child who appears to be less than 8 years old laying on her side with her underwear pulled down. An adult male is next to her and his penis appears to be penetrating her vagina.

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<sup>2</sup> Based on your affiant's training and experience, I know Samsung mobile telephones are manufactured outside the State of New York.

## CONCLUSION

15. Based upon the above information, there is probable cause to believe that AARON BOHANNON: (a) knowingly distributed material that contains child pornography using any means or facility of interstate or foreign commerce or that has been mailed, or has been shipped or transported in or affecting interstate or foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Section 2252A(a)(2) and(b)(1); and (b) possessed material that contains an image of child pornography that has been mailed, or shipped or transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce by any means, including by computer, in violation of 18 U.S.C. § 2252A(a)(5)(B) and (b)(2). Accordingly, I respectfully request that this Court authorize a criminal complaint charging AARON BOHANNON with violating those statutes.



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Sean A. Mullin, Special Agent  
Homeland Security Investigations

Sworn and subscribed to before me  
this 21st day of June 2019



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Hon. Thérèse Wiley Dancks  
U.S. Magistrate Judge